Exhibit A
CBT's Comments on Measurements Proposed in Appendix A
Filed June 1, 1998

I. Pre-Ordering (NPRM ¶ 43)

Average Response Time

CBT does not currently measure and has not been requested to provide response time measurements to CLECs, nor does CBT have this type of internal measurement. CBT has the capability of providing most of the features listed in the proposed Categories through its pre-ordering gateway. However, Due Date Reservation is done via the LSR (any Due Date in compliance with contractual specifications is acceptable) and Appointment Scheduling and Rejected Query Counts are not available through the gateway.

While CBT's Pre-Ordering system can provide CLECs the above features, CBT does not trap and analyze every message to/from its systems and, therefore, cannot measure the response times to the systems. Nor can it analyze the response times by individual carrier or by pre-ordering sub-function. To measure the Average Response Time for the features CBT offers, CBT would either need to invest in major revisions to multiple systems which contain this information, or purchase a new system that could monitor all transactions to multiple systems and analyze their content in order to provide these measurements.

II. Ordering/Provisioning

A. Order Completion Measurements

Average Completion Interval

CBT does not have the capability to capture and report the data necessary to report an average completion interval. The completion systems either do not contain the

correct time of completion, or do not include a time at all. To include specific times in the reports would cause an inordinate amount of manual investigation and manual analysis of all orders CBT provides to CLECs and to retail customers. Investigation of every order could include getting the notes from the completion tester to find the time of the final entry. The amount of effort to produce this report would heavily outweigh the benefit provided. Of primary concern to any carrier in Completion measurements is the ability to meet commitments to end users. That is the information provided today by CBT. A measure of the completion interval has too many external influences to be a trusted measure. Different operating procedures among CLECs can influence the notice they give when placing orders.

Percent of Due Date Missed

CBT would suggest changing the proposed measurement to only consider orders completed during the period. This would improve the accuracy of the data. By counting any order completed in the reporting period, made or missed, CBT still counts every order, but has complete data as to why any missed circuits were missed. The Commission's proposed measurement would count orders that were missed, but not yet completed, so the cause of the miss might not yet be known. This could result in CLEC customers not getting information as to why their circuit was missed, and might cause problems that were caused by the CLEC to be blamed on the ILEC.

CBT would not break the data down between dispatch and non-dispatch orders. That distinction is important when initially setting the Due Date, but is not crucial when measuring Due Date Made percentages. To collect that information would require a

manual analysis of each completed order (for CLECs and CBT Retail), and a manual count of the data. Such a technique would be expensive and error prone. The distinction between Unbundled Loops with or without INP should also be removed. The two items are separate orders, and counting the link would be a manual effort. Since nearly all CLEC orders in CBT's territory are now LNP, the extra effort adds very little value.

Missed Order Report

For data to be meaningful, CBT feels it is valuable to have an indicator of why orders are missed. For access customers, CBT provides a breakdown of missed orders and how many were missed for various reasons. For example, the number of orders for that customer missed due to Lack of Facilities, Equipment Problems, Resource Problems, etc. are all provided. CBT is working on similar reports for the CLECs, so that they will know the cause of any misses they experience in a Reporting Time Period.

B. Coordinated Customer Conversions

Average Coordinated Customer Conversion Interval

This measure is not provided today and has not been requested by CBT's CLEC customers. To measure the amount of time to complete coordinated customer conversion intervals, a tracking system would have to be implemented to measure the amount of time from start to completion. Since different workgroups perform different parts of the process, that tracking would be difficult to capture. Given the interworking of the CLEC and the ILEC in this case, the measure would most likely not cover important factors in the conversion time.

CBT has in its interconnection agreements specified a time window within which coordinated cutovers are to occur. If required at all, a more reasonable measure to implement, which has still not been requested by CLEC customers, would be the percentage of orders that are converted in the interval specified in the contract. However, that would still require a manual procedure to be put in place whose additional costs would outweigh any benefit to be derived.

C. Order Status Measurements

1. Average Reject Notice Interval

CBT does not measure this today, nor have the CLEC customers requested this measurement. To gather this information would require a manual tracking of each rejection. This measurement would be somewhat easier if it only pertained to orders received through the electronic gateway, but would still require manual analysis.

2. Average FOC Notice Interval

Per its interconnection agreements, CBT commits to a FOC by 5:00 p.m. the next business day, after receipt of a valid order. To measure the precise time would require a manual review of each order with a calculation as to the specific time. The Commission proposes this data be broken down by 13 wholesale and 6 retail service categories. Since the timely delivery of FOCs is a measure of the responsiveness of an ordering center, and not of individual service types, the extra work of breaking the data into categories does not add value. An aggregate number is sufficient to gauge the responsiveness of the center. For the ILEC, there is no FOC for retail customers and this measure should not apply.

3. Average Jeopardy Notice Interval

Today, CBT does not provide jeopardy notices on orders. On the retail side, the only way CBT's retail sales force will find out about a jeopardy is by proactively calling to ask, and that same option is available to CLECs. A measure of how long before the Due Date Jeopardy Notices are issued would not provide much information. The times would vary depending on the type of jeopardy. If facilities are not available, a jeopardy would come early in the process, while if there is trouble doing Central Office work, a jeopardy would come near the end of the process. If such a notification system were put into place, it would require a manual process to track it, and the issue of tracking specific times during the day would again be a problem.

4. Percentage of Orders Given Jeopardy Notices

Even if such a notification process were put in place, this measure would not give an indication of quality of service. Most likely, it would be a measure of which CLECs order services in areas where CBT is tight on facilities. In any event, a high percentage of orders that go into jeopardy are still completed on time, so the value added by this statistic would not outweigh the effort to measure it.

5. Average Completion Notice Interval

Through negotiations, CBT has established a standard way to provide completion notice. A data dump at the end of the day will identify all orders completed on that day. Given that process, this measure would only show whether an order was completed. A measure of how many orders are reported on the day they are actually completed would be a more meaningful measure.

D. Held Order Measurement

Average Interval for Held Orders

CBT does not currently provide nor has CBT been asked to provide a measure like this. To collect this data, every missed order would need to be analyzed, and the interval beyond the due date would be manually calculated. This data is not generated for existing retail orders, so the additional manual effort would also apply to the retail business. Once an order is missed, the commitment to the customer is already missed. CLECs, like other customers, can make the importance of any particular circuit known through the escalation process. CBT provides the completion percentages and a detailed report of missed orders with reasons for misses. That is the important information requested by our customers, and an interval for held orders is extra work that would add minimal value.

If this measure were a requirement, CBT would prefer not to measure all past due circuits at the end of the reporting period. That would mean that all circuits being analyzed would not yet have complete information as to why they were missed, and whether or not they should be excluded. Better data could be gathered by measuring the delay on all past due circuits completed during the reporting period.

E. Installation Troubles Measurement

CBT is concerned that a measurement of trouble on circuits that have been in service less than 30 days would place an extreme burden upon CBT. This measurement would produce a cost that would vastly exceed any benefit to be derived. This measurement would require an extremely difficult and intense manual effort requiring

manual inquiry into two completely separate CBT systems. This measurement would not add significant value beyond other repair measurements.

F. Order Quality Measurements

1. Percentage of Order Flow Through

CBT does not provide this measurement today. CBT has implemented an automated gateway system at the demand of one CLEC in accordance with the schedule approved by the PUCO. That system is tested and ready to receive orders, but neither the CLEC that requested it nor any other CLEC has chosen to use the automated system. If required to measure this statistic, and if any CLEC chooses to connect electronically, this measure could be attained with a reasonable amount of manual effort. This measure, however, does not necessarily indicate better service. If the FOC is received within the committed timeframe and the order is completed on time, the amount of manual effort only impacts CBT. It may be in CBT's best interest to automate the ordering process to reduce its workload, but is not a significant measure for the CLEC. There is no equivalent internal measure for the ILEC. Since orders placed by ILEC reps go directly into legacy systems, there is no flow through measure available.

2. Percentage of Rejected Orders

This measure is mostly a reflection of the CLEC's ability to place orders. An order is rejected because of errors on the original order. This measure would be an indicator of the CLEC's ability to properly use industry standard practices (OBF forms) to submit orders. CBT is pursuing a measure of this and analyzing what is needed to get these numbers from CBT's systems, but the internal desire to see the numbers should be

the driver for this measure, not a regulatory requirement. There is no equivalent internal measurement being utilized like this today. Like the percent of flow through, CBT's internal desire to see the numbers to improve its operations should be the driver for this measure, but even then a comparison to CLEC data would result in an apple and orange comparison because separate systems utilizing different edit checks could not be compared.

3. Average Submissions per Order

Like the percentage of rejected orders, CBT feels this is a reflection of CLEC readiness. CBT is also pursuing CLEC and internal measures for this type of information, but feel CBT's internal desire to seen the numbers should be the driver for this measure.

G. 911 Database Update and Accuracy

1. Percentage of Accurate 911 and E911 Database Updates

2. Percentage of Missed Due Dates for 911 and E911 Database Updates OR Average Time to Update 911 and E911 Databases

CBT believes that it should not have to measure the timeliness of CLEC updates to the 911 and E911 databases as the data is not within its control. Under CBT's interconnection agreements, CLECs perform their own updates to the E911 database. CBT's current system design prohibits it from monitoring a CLEC's timeliness of record updating and database accuracy. Competing carriers utilize an electronic interface to update their records to the 911 database. Only summary statistical data, such as total records processed and type of transaction (Inserts, Change, Deletes, and Errors) is provided to CBT for performance reporting.

III. Repair and Maintenance

1. Average Time to Restore

CBT is providing this measurement to CLECs.

2. Frequency of Trouble in 30-Day Period

Frequency of trouble in a 30 day period measured on a per line basis would require a manual search of all CLEC accounts. Many CLECs have multiple billing accounts with CBT. A measurement based upon the number of lines would require an extremely difficult manual search which would result in a measurement whose costs greatly exceeds its value.

3. Frequency of Repeat Troubles in 30-Day Period

CBT plans to track repeat troubles within a 30 day period. This can be provided to each CLEC if requested.

4. Percent of Customer Troubles Resolved Within Estimated Time

For Special services, this type of estimate would not apply. Testers begin working on the trouble right away, and may not need to dispatch right away. Due to the complexity of these orders, no reasonable estimates can be given, only updates. This holds true for CLEC troubles and for retail troubles.

IV. Billing

1. Average Time to Provide Usage Records

2. Average Time to Deliver Invoices

These records are produced in an automated fashion and go out at the same time every month, based upon negotiations with the CLECs. There is no need to measure this. CLECs will know if billing usage data is not provided on time. These automated systems rarely have problems, but if a problem occurred, it would be immediately known and addressed. This type problem would not be a measure of ILEC performance. Obviously, a manual measurement of an automated system should not be required.

V. General

A. Systems Availability Measurement

CBT's automated systems are not currently being utilized by any CLEC. Once utilized, a measurement of system availability would be reasonable.

B. Center Responsiveness

Average Time to Answer Competing Carrier Calls

CBT's responsiveness has not been an issue. At this time, CBT has an internal measure of response time, but the data could not separate out individual CLECs and would be only an aggregate measure. Currently, CBT does not provide this data externally but such data could be available if a CLEC felt a problem existed and wished to negotiate for a report. Requiring a report where no problem is even alleged to exist is not a prudent use of scarce resources.

C. OS/DA

1. Average Time to Answer

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CBT's current Directory Assistance operation can measure average time to answer if competing carriers use dedicated trunks to access CBT's DA operators. CBT cannot differentiate performance measurements (i.e. time to answer) if multiple competing carriers utilize the same trunk groups to access CBT's DA bureau. Time to answer measurements for DA would be provided in aggregate for those carriers who share trunk groups demonstrating at a minimum that service is nondiscriminatory with that of CBT's own end user customers.

CBT does express concern regarding the Commission's perception of what "nondiscriminatory" means as it relates to time to answer. Currently, CBT provides DA services to Interexchange Carriers, LECs and competing carriers who deliver their traffic on dedicated and shared trunk groups to CBT's DA operators. CBT has experienced fluctuations in time to answer by trunk group even though the time to answer standards for each trunk group are equal in the switch operational design. In other words, all traffic is handled on a first call in first call served basis but the time to answer for one trunk group does not always match the identical measurement on another trunk group. The DA call volume being handled by a trunk group or the time when the traffic is delivered may impact the time to answer. For example, an ILEC generally has sizable DA call volumes and can absorb a longer answer time for a short period of time without the overall average being impacted significantly. Conversely, the average time to answer for a CLEC with a small call volume could be significantly impacted if that CLEC's DA traffic happened to come during a particularly busy period and, thus, different times to answer could occur under exactly the same answering practices.

Operator toll and assist services have been outsourced by CBT for many years. CBT would be dependent upon its vendor to provide time to answer measurements for competing carriers requesting CBT's Operator Services. These matters are largely out of the control of CBT.

CBT can only measure time to answer by trunk group and for those competing carriers who share trunk groups for DA or OS services, time to answer measurements should be reported in total, not separated by carrier. Furthermore, the Commission should consider relevant ranges for time to answer requirements to monitor discrimination since answer time can vary slightly from trunk group to trunk group, due to the examples cited above.

Time to Answer for access to the DA database is generally referred to as response time, i.e., the time it takes an operator to retrieve DA listing information once a search is initiated. CBT provides read only access to its DA database that will provide competing carriers exactly the same information as CBT DA operators. CBT will measure response time of the read only access database to ensure it is consistent with CBT's local retrieval system response time. Response time, however, may be different due to varying keying strategies and practices. Searching a database in an inefficient manner could potentially slow database retrieval, therefore, CBT should not be responsible for the way in which a competing carrier's operators may search.

VI. Interconnection

A. Trunk Blockage Measurements

1. Percent Blockage on Interconnection Trunks

2. Percent Blockage on Common Trunks

CBT's interconnection contracts already contain trunk blocking standards. The monitoring of blockage is the equal responsibility of the CLEC and the ILEC. Both monitor the trunks and work together to add trunks as necessary. Both need to agree to add trunks, so blocking cannot be attributed to one carrier or the other. CBT has provided trunking reports upon requests to CLECs in order to help analyze trunking problems. CBT monitors this data, and works with CLECs to ensure the trunking network provides quality service to all end users. However, monthly reports are not generated for the CLECs regarding trunking. Since both the ILEC and the CLEC monitor the trunks, CBT would propose the existing arrangement to continue, since it is currently working to the satisfaction of the parties. No regular reports are required, but reports can be requested on occasion, provided this right is not abused.

B. Collocation Measurements

1. Average Time to Respond to a Collocation Request

2. Average Time to Provide a Collocation Arrangement

3. Percent of Due Dates Missed With Respect to the Provision of Collocation Arrangements

CBT's interconnection agreements contain procedures for processing collocation requests. No collocation measurements are provided to, nor have they been requested by, CBT's CLEC customers. Only seven collocation requests have occurred in CBT's territory to date. Given the low volume, no measure could have statistical significance. There is no automated system for tracking collocation requests, so gathering these measurements would be difficult, based on correspondence between the companies.

Given the low volume and the difficulties of collecting this information, CBT would recommend that this process run without measurement. If a CLEC feels it is being unfairly treated, it could complain and an investigation could follow. If a measurement is required at all, CBT would recommend a single measure of whether collocations are completed in the interval specified in the contract.

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